

12.3.95

ECOLOGY NORTHWEST REGIONAL OFFICE
HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

Facility:

United States General Services Administration
Seattle Federal Center South
4735 East Marginal Way South
Seattle, WA 98134-2325

Facility Contact:

Pearl Eggerud
Assistant Manager
GSA Auburn Field Office
(206) 931-7884

Site ID Number:

WA8470031891

Inspection Date:

February 9, 1993
February 11, 1993

Inspectors:

Jeannie Summerhays - Lead
Mike Burnett - 2/9/93
Josh Chaitin - 2/11/93

Report prepared by Jeannie Summerhays

Reason for Inspection: Facility has never had a RCRA compliance inspection. Ecology had also received a complaint regarding the site in the past.

Barbara Smith 6/9/93

Reviewer's Signature

John Smith 6/10/93

Reviewer's Signature



SEPA REGISTER - Department of Ecology

12/24/92

DOCUMENT TYPE	DOE REG					
MOOE NO.	LEAD AGENCY	PROJECT DESCRIPTION	DUE TO ER SEC	SENT TO (1)	SENT TO (3)	SENT TO (2)
7997	WA State Dept. of Natural Resources	Expand an existing gravel pit operation from 10 acres to 53 acres, on Gravel Pit Rd, San Juan County (Sea Island Sand and Gravel)	01/04/93	Janet Thompson-Lee, NWRO		
DNS 8008	NW City of Sedro-Woolley	(Revised) Comprehensive Plan amendment from Single Family to Office and Apartment, and rezone from Single Family Residential to Office and Apartment, construct a 40 unit apartment complex, SE corner of Cook and Trail Roads (Gene Bouma)				
DNS 7892	NW Northwest Air Pollution Authority	Install an air stripper to remove unwanted dissolved hydrocarbons from a wastewater stream at an oil recycling facility, then hydrocarbons will be routed to an existing boiler for incineration, 744 S March Point, Anacortes (Vintage Oil Inc)	12/30/92	Janet Thompson-Lee, NWRO		Mike Palko, Industrial
DNS 8009	NW WA State Dept. of Transportation	Construct office and storage buildings totalling 26,000 sq ft in three stages, 1735 E Hickox Rd, Mount Vernon, Skagit County	01/06/93	Janet Thompson-Lee, NWRO		
DNS 7958	NW Island County	Divide 24.07 acres into 3 lots, bounded by Sunrise Blvd, Moe Rd, and Iverson Rd (Harry Dimmerman)	12/31/92	Janet Thompson-Lee, NWRO		
DNS 7956	NW Hansville Water District	Annex 3 parcels of land to the Hansville Water District, Beaver Pond Annexation; Homestead Annexation; and Weggoner-Amos Annexation, Kitsap County				
DNS 7919	NW Kitsap County	Commute Trip Reduction Plan/Ordinance, reduce motor vehicle commute trips, require all major employers CTR programs to encourage employees to use alternate modes of travel to commute to work	01/05/93	Janet Thompson-Lee, NWRO		
DNS 7982	NW Kitsap County	Whisper Ridge, divide 43 acres into 36 residential lots, 3/4 mile south of Newberry Hill Rd and west of Eldorado Blvd, 2 miles SW of Silverdale (Stafford Homes)	01/06/93	Janet Thompson-Lee, NWRO		Ann Rensberg, BH
DNS 8005	NW WA State Dept. of Wildlife	Plant triploid grass carp to control aquatic vegetation, 811 Cherry Ave, Bainbridge Island, Kitsap County (Ving Point Golf and Country Club)	01/07/93	Janet Thompson-Lee, NWRO		Ann Rensberg, BH
DNS 7952	NW City of Arlington	Construct an addition to an existing church, 3rd and Stillaguamish Ave (Arlington Assembly of God Church)				
DNS 7891	NW City of Edmonds	Grade 1,355 cu yds of soil and				

Facility Description

The United States General Services Administration (USGSA) acts as the owner or caretaker of federal property. They rent space to federal agencies at numerous sites in Washington State, as well as across the nation.

At the Seattle Federal Center South, space is rented by the USGSA to the following 15 agencies or organizations: the Corp of Engineers, Air Force Waterport Logistics Office, Bureau of Indian Affairs (BIA), FBI, Military Traffic Management Center (MTMC), Marine Recruiting Office, Army Recruiting Office, Eighth Army, Nurses Corp, Alaska Native Health, Dept. of Defense Investigators, Defense Contracting Audit Agency, Government Printing Office, a private day care center, and a physical center. Approximately 850 to 1,000 employees work at the Center, with the largest employer being the Corp of Engineers (apx. 600 employees). The USGSA employs approximately 5 employees at the Center. They are responsible for maintenance of the facility.

The Center has a hazardous waste ID number (WA8470031891) and is identified on the computerized RCRA Notifiers List as a large quantity generator. The Air Force Waterport Logistics Office (AFLO) also has a site ID number for the same address (WA0572790046). None of the other agencies have acquired their own site ID number.

Wastes Generated

The GSA generates maintenance related wastes only. These are:

- * waste oils (these include vehicular oil, diesel oil, compressor oil, and refrigeration oil)
- * waste solvent from a parts cleaner
- * spent paints and lacquers
- * PCB contaminated waste
- * asbestos
- * water treatment solutions from large air conditioners
- * water treatment solutions from the boilers

All wastes generated by GSA are in small quantities. Management of these wastes will be described in this report.

The AFLO may be off-loading hazardous wastes from barges which dock at the facility, which is located on the Duwamish River.

The BIA also appears to off-load hazardous products and possibly hazardous wastes at the site from barges.

The FBI and the Corp of Engineers maintain motor pool vehicles at the site.

SEPA REGISTER - Department of Ecology

12/24/92

DOCUMENT TYPE	DOE REG	LEAD AGENCY	PROJECT DESCRIPTION	DUE TO ER SEC	SENT TO (1)	SENT TO (3)	SENT TO (2)
DNS	SN	WA State Dept. of Natural Resources	Partially cut 10 acres, 2 miles north of Prindle, Skamania County (Eddie Johnson)				
DNS	NW	City of Bellingham	(Relinquished) Construct a retail, office, and motel complex with 412 parking spaces on 5.8 acres, 4160 Meridian St, NE corner of Prince Ave and Meridian St (Caltac Manufacturing)				
DNS	NW	City of Ferndale	Construct a 4,800 sq ft office, storage, and assembly building, off Slater Rd, 500 ft from I-5 (Whitehorn Group)				
DNS	NW	City of Lynden	Regrade an existing parcel, install subsurface stormwater infiltration system, pave and landscape parking lot, on the NE corner of the intersection of 5th St and Liberty St (People's State Bank)				
DNS	NW	WA State Dept. of Natural Resources	(Addendum) Excavate a 17 acre gravel pit, 8599 Valley View Rd, Whatcom County (Colacurcio Bros. Construction)				
DNS	NW	WA State Dept. of Natural Resources	Lease 287.40 acres for oil and gas exploration, 5-6 miles NE of Ferndale, Whatcom County	01/11/93	Janet Thompson-Lee, NWRO		
DNS	NW	Whatcom County	Divide 2.31 acres into 3 lots, 2330 North Shore Rd (Jim Boucette)				
DNS	NW	Whatcom County	Fill site with 2,000 cu yds to match the grade of the existing driveway and road, 5622 Guide Meridian (Callen Construction Co)				
DNS	NW	Whatcom County	Fill site to match the grade of the adjacent properties to the north and south, 4306 Guide Meridian (Crispin Y.C. Norng)	12/30/92	Janet Thompson-Lee, NWRO		
DNS	NW	San Juan County	Divide 17 acres into 8 lots, Orcas Island (Corey Cookston)				
DNS	NW	San Juan County	Divide 9 acres into 4 residential lots, adjacent to Westcott Bay, east of Sou'west Dr (Verne Hossard)	01/04/93	Janet Thompson-Lee, NWRO		Linda Rankin, BH
DNS	NW	San Juan County	Expand an existing commercial horse facility and establish a transient accommodation, accessed by West Beach Rd (Jeri and Douglas Smart)				
DNS	NW						

Site Inspection

Denial of Access - February 9, 1993

On February 9, 1993, Mike Burnett and I arrived unannounced at the facility at approximately 9:15 am. We asked the Information Desk staff person for Ms. Pearl Eggerud, who was identified as the facility contact on the Notification Form. We were informed that Ms. Eggerud had moved to the GSA Auburn Field Office. We then asked for the person in charge of hazardous waste management at the facility. We were given directions to the office of Mr. Bill Galloway, Maintenance Foreman for the Federal Center South.

Mr. Galloway informed us that inspectors are normally not allowed to conduct inspections without scheduling the visit in advance. He contacted Ms. Eggerud. After she discussed the issue with her supervisors, she informed Mr. Burnett by telephone that we would not be allowed to conduct the inspection as we had not scheduled an appointment. I then talked with Ms. Mona Evans, Auburn Field Office Manager, who also stated we would not be allowed to conduct the inspection. She stated that allowing an unannounced inspection would set a precedent for other GSA offices. She stated that Mr. Ron Smith, the Chief of the Facility Support Branch, had made the decision to not allow us to conduct the inspection. All GSA parties repeatedly stated that this was a federal facility and that inspection procedures are conducted differently for them. I had stated to both Mr. Galloway and Ms. Evans that this legally is viewed as "denial of access". After approximately 30 minutes of discussions and phone conversations, we left the facility.

We contacted Tanya Barnett, an Attorney General for Ecology. Ms. Barnett contacted the GSA attorney, Mr. Dick Mowen. After internal GSA discussions, Mr. Mowen assured Ms. Barnett that GSA facilities will be cooperative and that personnel at the three GSA field offices (Seattle, Auburn, and Spokane) will receive proper training regarding this issue.

Site Inspection, February 11, 1993

Mr. Chaitin and I arrived at the Auburn Field Office at 10:45 am to review hazardous waste documentation. We were introduced to Ms. Eggerud and Ms. Evans. Both were cooperative.

We asked for a general description of the facility. Some of the information they provided is described under the "Facility Description" section of this report. Additional information they provided included:

- * "Water treatment" solutions used to control corrosion and algae in the "chillers" or air conditioners is periodically drained "into drains".

SEPA REGISTER - Department of Ecology

12/24/92

DOCUMENT TYPE	DOE REG	LEAD AGENCY	PROJECT DESCRIPTION	DUE TO ER SEC	SENT TO (1)	SENT TO (3)	SENT TO (2)
DNS	SW	7907 Cowlitz County	of fill to cover the culvert, 6101 Green Mountain Rd, Woodland (Paul A. Gabalis)				
DNS	SW	7907 Cowlitz County	Install a 48 inch by 53 inch pipe arch in the center fork of Coal Creek to provide access for removal of logs and access to a future home site, 3031 Coal Creek Rd, Longview (Roger W. Davis)	12/30/92	Sarah Barrie, SWRO		
DNS	SW	7942 City of Camas	(Revised) Construct #2 cut size sheet piling and access road, adjacent to and integral with the existing mill complex, south of Warehouse #4 (James River II)	12/30/92	Sarah Barrie, SWRO		Yeddy Le, Industrial
DNS	SW	7932 City of Vancouver	Remove and/or upgrade 10 underground fuel storage tanks, 1601 E Fourth Plain Blvd (Veteran Affairs Medical Center)	12/30/92	Sarah Barrie, SWRO		
DNS	SW	7914 City of Washougal	Store pulp logs, 10,000 tons at full capacity, on 4 acres, a portion will be utilized to process chips, within the Port Industrial Park, 3781 Grant St (Columbia Fibre Ltd)	12/30/92	Sarah Barrie, SWRO		
DNS	SW	7937 Clark County	Dredge a seasonal pond and regrade sides of the pond on a 5 acre lot, 17332 NE 72nd Ave, Vancouver (William Clemons)	12/29/92	Sarah Barrie, SWRO		
DNS	SW	7903 WA State Dept. of Natural Resources	Harvest 4.7 acres of timber and convert to 2 lots, 1 mile east of Hockinson, Clark County (Hubert F. Hamola)				
DNS	SW	7985 WA State Dept. of Natural Resources	(Adoption) Cut 1.25 acres and convert to a single family residence, west side of SE 312th, 225 ft south of SE 40th St and north of Shepherd Rd, near Washougal, Clark County (Bill Coonrod)	01/04/93	Sarah Barrie, SWRO		
DNS	SW	8002 WA State Dept. of Natural Resources	Clearcut 1 acre and convert to a homesite with an additional 14 acre partial cut, 4 miles east of Orchards, Clark County (Willard M. Aldrich)				
DNS	SW	7913 Washington State University	Construct a temporary fence encompassing the abandoned dairy complex, demolish barns, several outbuildings, silos, concrete floors, foundations, and asphalt paving, 1 mile NE of the I-5/I-205 intersection, Vancouver, Clark County	01/11/92	Sarah Barrie, SWRO	Linda Rankin, BH	Ann Rensberg, BH
DNS	SW	7991 Skamania County	Rezone site and place a 3 bedroom mobile home, Salmon Falls Rd (Bonnette Family Living Trust)				

Ms. Eggerud believed these drains discharged directly to the Duwamish River. She did not believe the waste has been characterized. She will send the MSDS for the product. She noted it is greatly diluted when used.

- * Ms. Eggerud believed the water treatment for the boiler is also directly discharged. MSDS sheets will be provided for this product as well.
- * When I asked if hazardous wastes are brought on-site by the agencies, Ms. Evans responded that they "could bring anything they please" as they pay GSA for rental space.
- * When I asked about the specific activities of the rental agencies, Ms. Evans and Ms. Eggerud provided the following information:
 - * Corp of Engineers - Most of the space at the Center is rented by the Corp. The space is primary office and warehouse space. The Corp also operates a motor pool at the site.
 - * BIA - The BIA constructs wooden pallets at the site for materials shipped to and from Alaska.
 - * Air Force - The Air Force rents the large 1202 building. This is primarily used to stage supplies for shipping to Alaska.
 - * FBI - the FBI operates a small motor pool in building 1203 at the site.
 - * Military Traffic Management Center (MTMC) - The MTMC does all the contracting of barges used by the Air Force and the BIA at the site.
 - * Barge Activity - Approximately seven "sails" occur during the year, with the busiest months being April through July. Two barges return in September and October. Many materials are staged at the Center for a short period of time before leaving the site. Ms. Evans and Ms. Eggerud were not specific as to what type of materials are staged.

Document Review

Ms. Eggerud informed me that hazardous waste documentation for the Center was on file at the Auburn Field Office. The following documents were reviewed:

- * Form 2 - The first notification was filed 6/30/87. The only waste listed was asbestos. The Form 2 was revised 2/10/92. This was done to change the installation contact and contact address. No wastes were indicated on the revised form.
- * Annual Reports (Form 4) - Annual reports for the last five years were available. The reports indicated that no hazardous wastes were on-site or shipped off-site during the past five years. I asked Ms. Eggerud how the spent parts cleaner solvent had been managed over the years. She responded that she believed that the FBI or BIA had recently disposed of the Center's solvent with their own hazardous waste. She said very little solvents or any other hazardous wastes are generated by the Center.
- * Manifests - Only one manifest was available (attachment #1). It showed "Norse/GSA" as the generator at a Tacoma address. The wastes were identified as TSCA wastes. Ms. Eggerud explained that ballasts containing PCBs were generated when the facility was "relighting". Norse was the contractor who did the work for GSA. We explained to Ms. Eggerud that the Center should have been identified as the generator and that the address should have been listed as the Center address, if they were going to use a hazardous waste manifest for TSCA wastes.

Based on the information provided, we informed Ms. Eggerud that the facility appeared to be a small quantity generator. We therefore, did not ask for a training plan, contingency plan, inspection records, etc.

We also discussed the potential hazardous waste activities of the other agencies. We explained to Ms. Eggerud that it is in the Center's best interest to not view the rental agencies' hazardous waste activities as independent of the Center. The Center may wish to determine, as the landlord, if hazardous wastes are being managed by other agencies and how they are doing this. We informed her that our records showed that only the Air Force had a separate ID number.

We decided to take a break for lunch and then meet Ms. Eggerud and Mr. Galloway at the Center. We left the Field Office at 12:20 pm.

Site Inspection

We arrived at the Center at 1:25 pm. We proceeded to Mr. Bill Galloway's office, where we were met by Mr. Galloway and Ms. Eggerud. We proceeded with the site inspection.

(Four buildings are on site. Please refer to the site map for all referenced locations.)

Building 1201 - Building 1201 is a large building which is divided into the "Low Bay Warehouse" and the "High Bay Warehouse". The Low Bay houses the Corp of Engineers offices and warehouse space. The Low and High Bays house BIA warehouse space (photo #5). We inspected these areas as well as the boiler and chiller rooms and the GSA working shop. No hazardous wastes were observed in the warehouse areas. Points of interest were:

- * Boiler Room (photo #1) - Mr. Galloway explained that the boiler is drained when it is worked on and also once every 3-4 years. He was not sure if the water treatment solution from the boiler goes directly to the Duwamish River or to Metro when drained.
- * GSA "Working Shop" - Two drums were located here. Both were labeled as "waste oil" and "waste solvent", though Mr. Galloway explained only one was used for waste oil (photo #2). The other drum was listed as containing gas, cleaning solvent, diesel oil, compressor oil, oil, and lacquer (photo #3). The date on the list was 2/5/93. Mr. Galloway explained that it takes more than a year to fill each drum. We discussed with Mr. Galloway and Ms. Eggerud the need to keep wastes segregated. We also again discussed the need for the Center to manage their own wastes, and not provide them to another agency for disposal. We asked Mr. Galloway what had been done with waste solvents from the parts cleaner in the past (photo #4). He responded that it is used very infrequently and that it had not been changed during the entire time he had been employed with the Center (6 years). He stated the GSA Seattle Field Office manages the waste oil. We also discussed proper labeling procedures as well as their generator status.
- * Chiller Room (photo #6) - We inspected one of four chiller rooms. A drain located in the floor is used to drain "blow down" from the chiller (apx. 5 gallons per day) and solution drained when the chiller is worked on. The chiller capacity is approximately 80 gallons. Mr. Galloway did not think any analysis had been done on the drained material to determine if it is hazardous waste. He stated the original corrosive product is greatly diluted when used.

* Fire Extinguishers - We inspected several extinguishers. They appeared to have been inspected recently. Mr. Galloway stated that they are inspected on a monthly basis.

* Containment Area - North of Bldg. 1201 is a containment area constructed by the Air Force to be used for storage of ignitable and hazardous products (photo #s 11 & 12). (To note: The facility file indicated that Laurence Ashley of Ecology had been asked to review the specifications for this containment prior to construction.) Mr. Galloway stated that spilled materials would drain in the slot provided (photo #9), go through an oil-water separator (photo #10), and then to the Duwamish River. He did not believe the oil/water separator area was designed as a holding tank (as defined in the containment area specifications). Along the north edge of the containment area were a number of drums labeled as gasoline or "Jet A-1" (photo #s 8, 11-13). None were labeled as hazardous waste. Several were bulging (photo #11). This was pointed out to the facility representatives, as well as the fact that the fuel would spill outside of the containment area if there was an accident. Some of the pallets were also not in good condition. Both facility representatives reiterated that this containment area was the responsibility of the Air Force.

* North Yard - Numerous containers and boxes were observed in the far north corner of the property (photo #s 16-21). We walked over to them and counted approximately 10 large wooden boxes and 17 drums. There were also approximately 15-20 gas cylinders. Three drums appeared to be fairly new. The rest of the drums and the wooden boxes appeared to have been outdoors for some time.

All were spray-painted by hand with the following types of content descriptions: thinners, ban ice, starting fluid, paint, flammable liquid, 30 wt oil, corrosives, and batteries/acid. Drums spray-painted as "empty" were not empty (photo #18). The containers appeared to be on pavement, but there was no secondary containment. The finding of these materials was consistent with the type of complaint Ecology had received in the past regarding the site (attachment #2). Mr. Galloway and Mr. Eggerud did not know how long the containers had been located in this corner and they did not know which agency they belonged to.

* Air Force Water Port Logistics Office - We proceeded to Building 1202. This is a very large

building which is used for material storage and for staging of Air Force supplies prior to shipment to Alaska Air Force bases and Alaskan and Canadian Air Force radar stations. The building also houses the Water Port Logistics Office.

We walked through the building to the Logistics Office. On our way, we observed new drums of hazardous product, but no hazardous wastes. At the Logistics Office we were introduced to Major Kelly. We asked if the containers in the north yard belonged to the Air Force. Mr. Rick Kesling, the Packing and Crating Supervisor, responded that they belonged to the BIA. We thanked them and proceeded to the BIA building.

- * Building 1206 - Building 1206 is a small building at the south end of the property which houses the BIA administrative offices. We were introduced to Mr. George Hillman with the BIA. We described the materials in the north yard and asked if they belonged to the BIA. He responded that they did, and that they were products that had been moved last spring from the warehouse to that corner of the property. He stated the BIA was "in the process of getting rid of them". We responded that the material needs to be removed as soon as possible by finding a recipient for usable product and manifesting the rest as hazardous wastes. We also informed him of the complaint Ecology received regarding hazardous waste near the property line. He stated this issue would be taken care of.

Post-Inspection Meeting

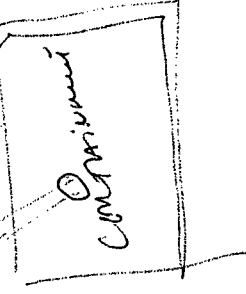
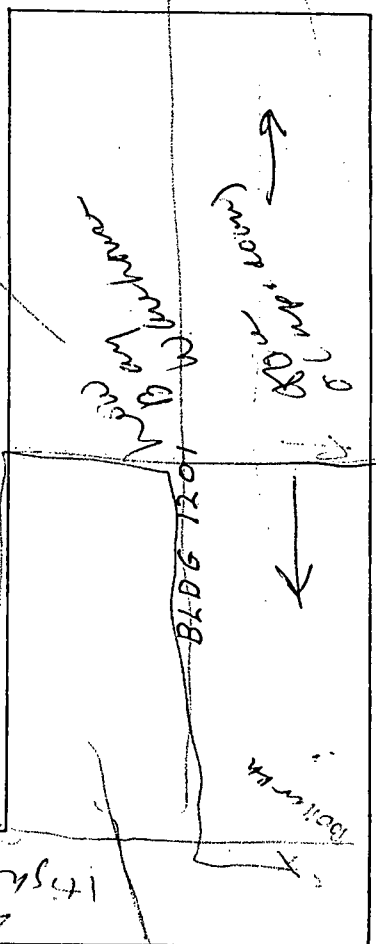
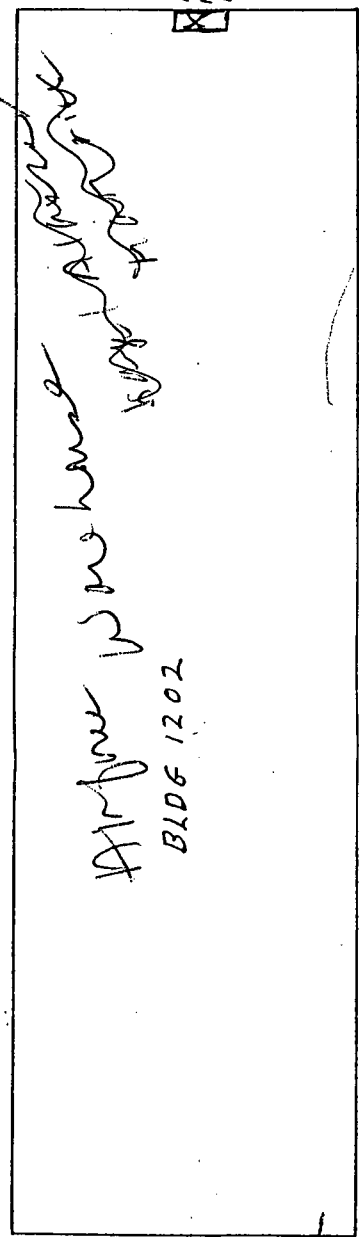
We returned to Mr. Galloway's office and discussed the inspection. We informed Mr. Galloway and Ms. Eggerud that we had met our intended goal of inspecting activities directly conducted by Center staff under site ID # WA8470031891. We explained that activities conducted under other identification numbers would not be addressed during this inspection. We provided several suggestions regarding tenant/landlord relationships we had seen in the past. We also indicated that we would send a separate letter to the BIA regarding their hazardous product/waste. We thanked them for their time and concluded the inspection at approximately 3:10 pm.

(b:GSAIR)

Handwritten notes at top left: "Air conditioning unit" and "Air conditioning unit" with arrows pointing to the top of the building.

Handwritten note: "FBI report" with an arrow pointing to the building.

BLDG 1203



Cylinders

DISPOSAL AVE.

Hazardous Waste

WATER METER 1202

NORTH

FEDERAL CENTER SOUTH

GAS METER

WATER METER 1201

E. MARGINAL WY S.

NE

BLDG 1206

Handwritten note: "Air conditioning unit" with an arrow pointing to the bottom of the building.

Handwritten note: "Air conditioning unit" with an arrow pointing to the bottom of the building.

Handwritten note: "Air conditioning unit" with an arrow pointing to the bottom of the building.

Photo No.: 1

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Chemical holding tank for hot water loop in boiler room (tank holds a fungicide)

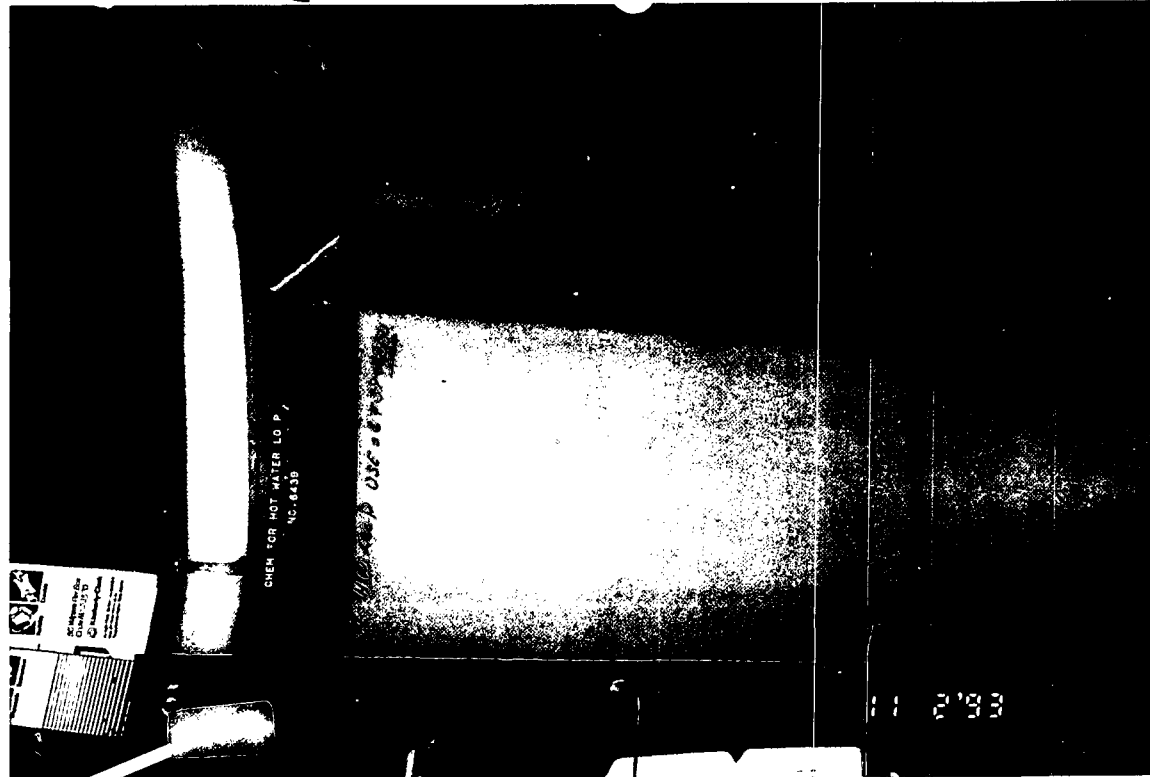


Photo No.: 2

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Waste oil and solvent drums (mix) in general shop

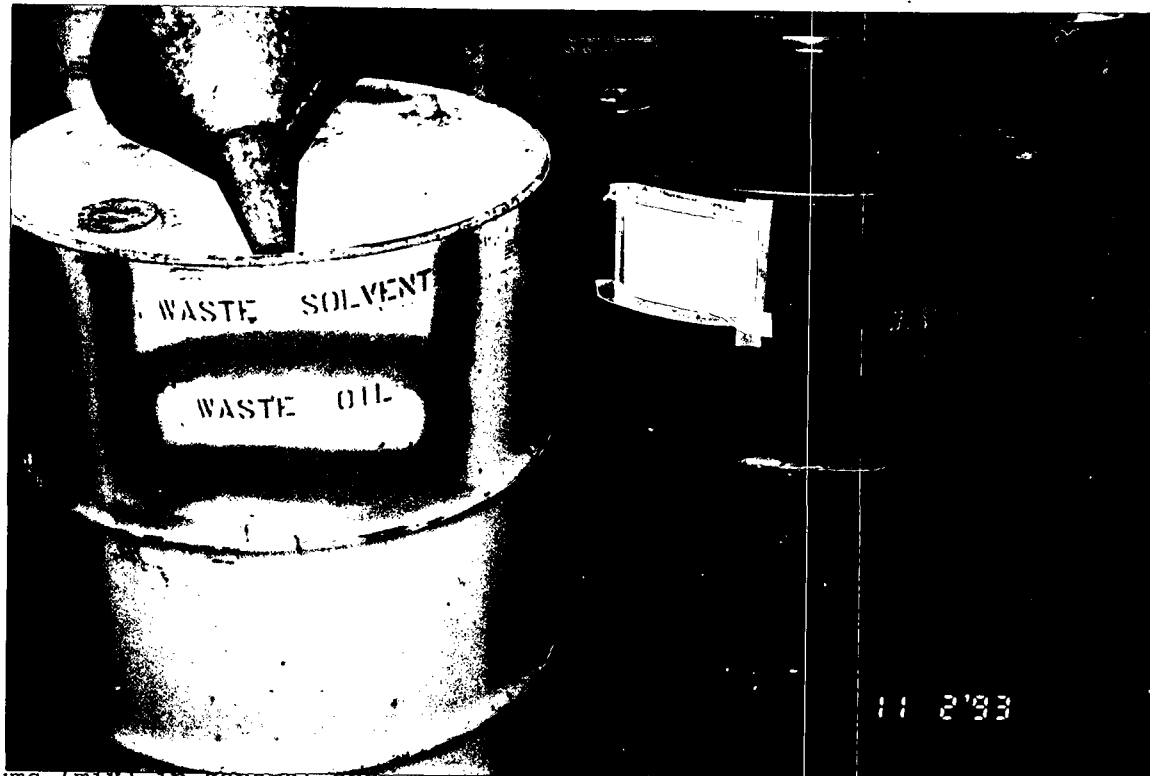


Photo No.: 3

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Label on waste oil/solvent drum

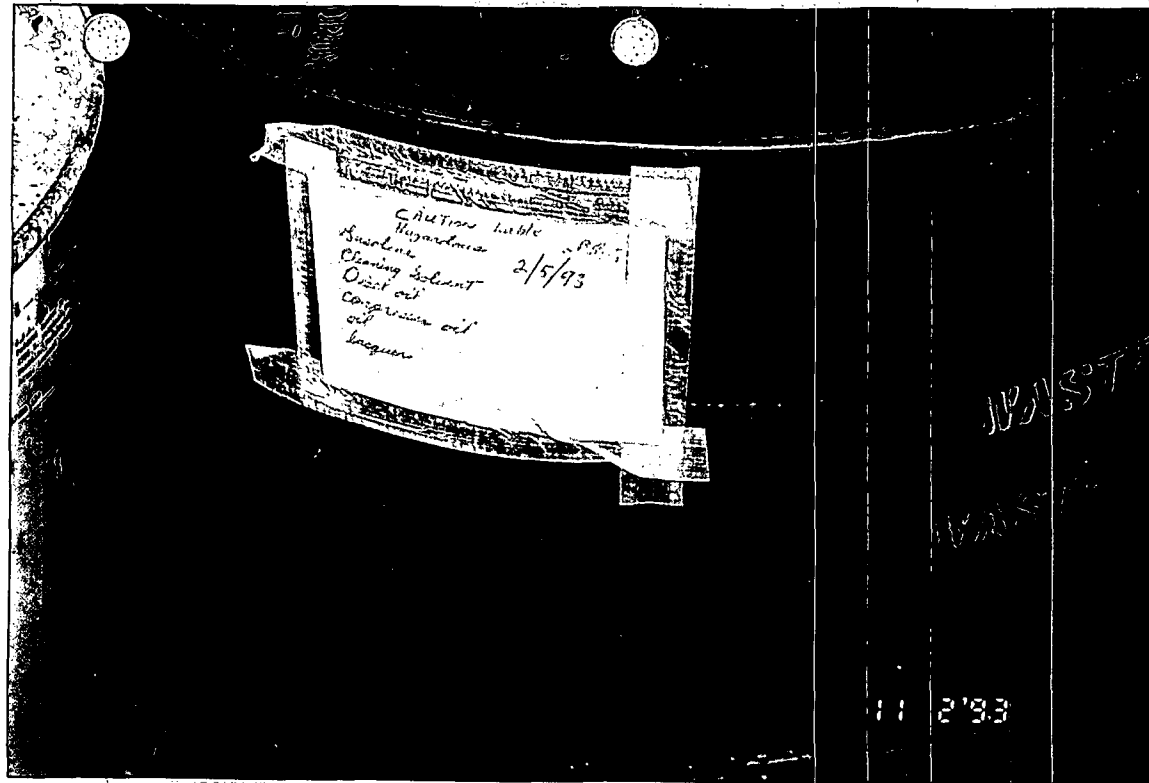


Photo No.: 4

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Parts cleaner unit with oily rags and waste auto battery in foreground
(general shop area)

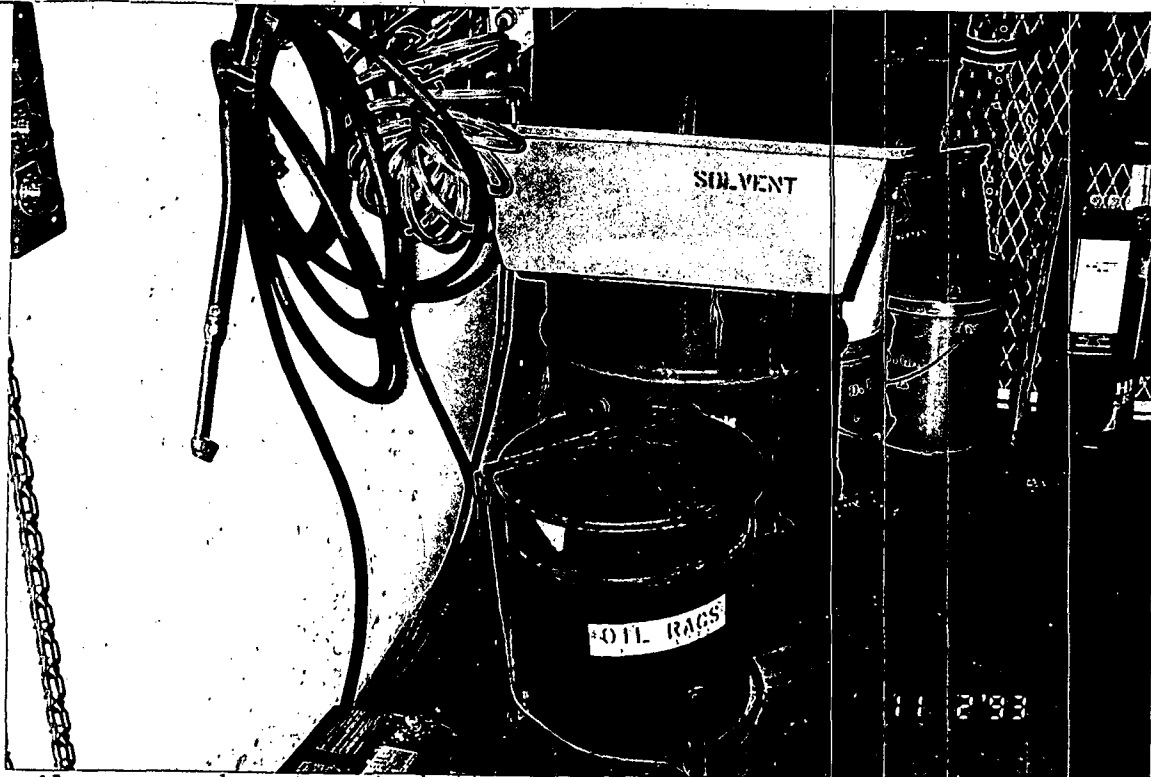


Photo No.: 5

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Wide shot of warehouse



Photo No.: 6

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Drum of chem. product (fungicide) in chiller room #1

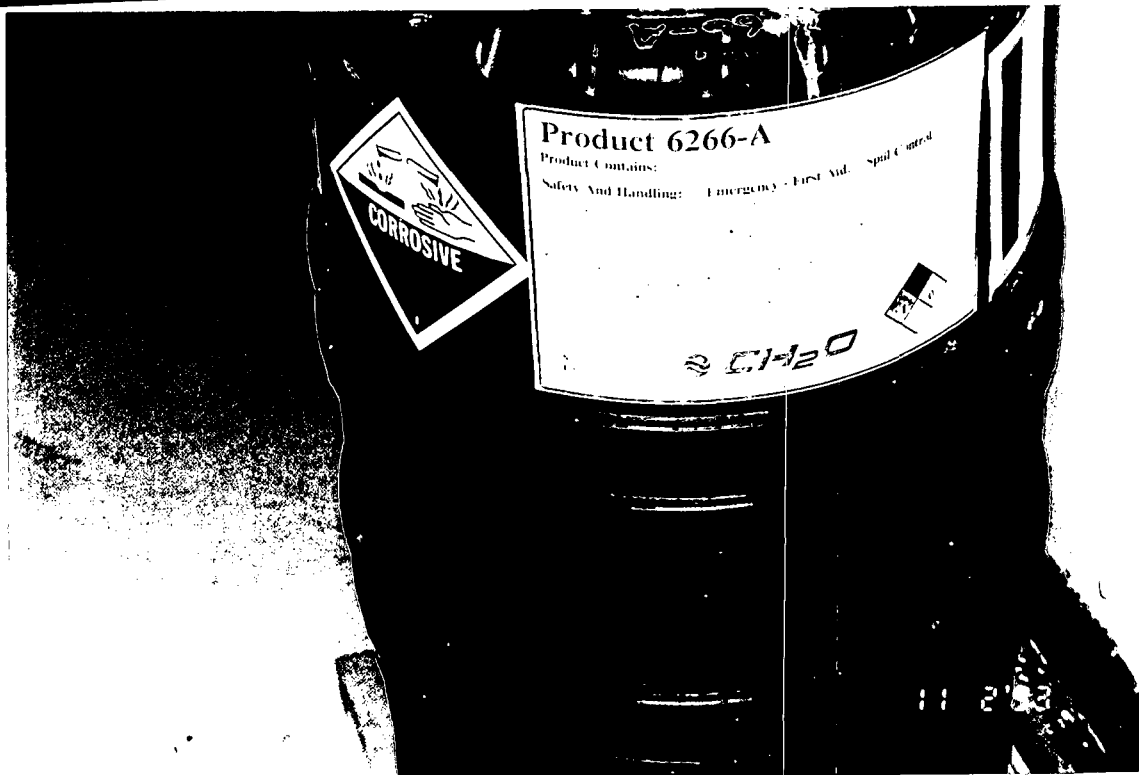


Photo No.: 7

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Containment pad, norhteast end of facility



Photo No.: 8

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Containment pad, northeast end of facility



Photo No.: 9

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Drain in containment pad (according to facility contact, the drain leads to a nearby oil/water separator)



Photo No.:10

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Oil/water separator near pad

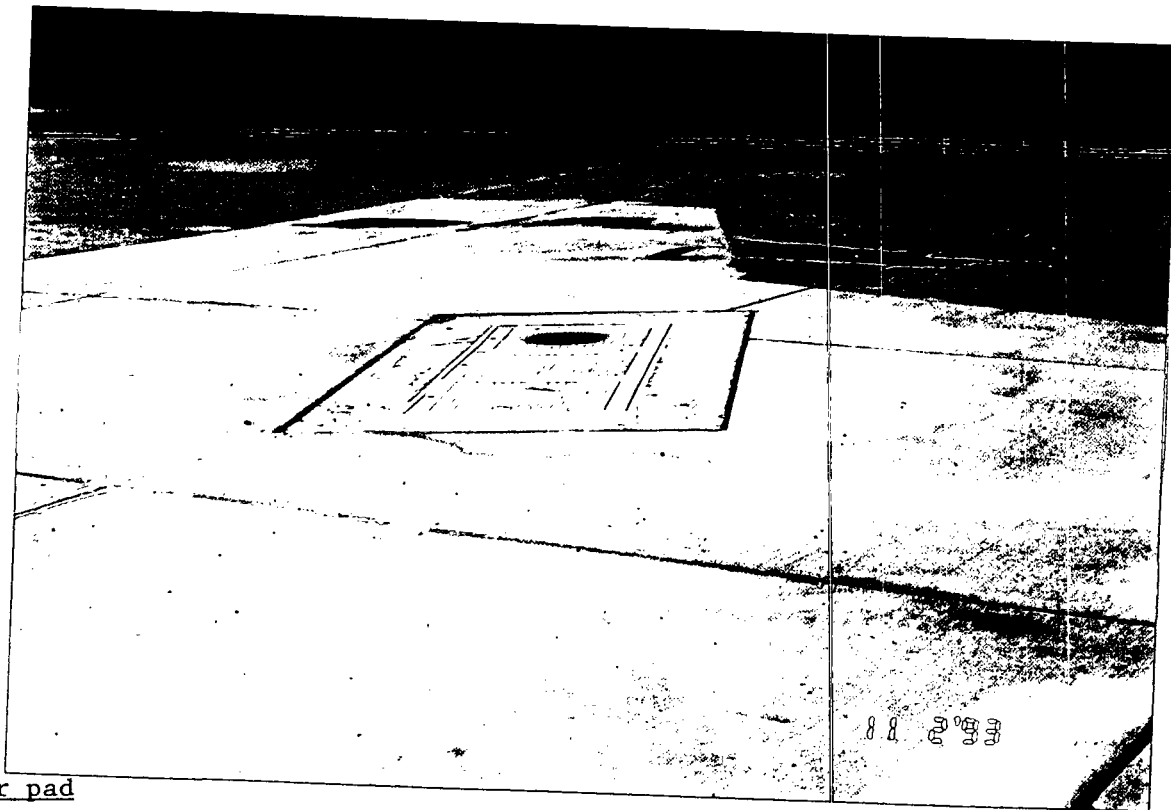


Photo No.: 11

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Bulging drum of product on northwest corner of containment pad

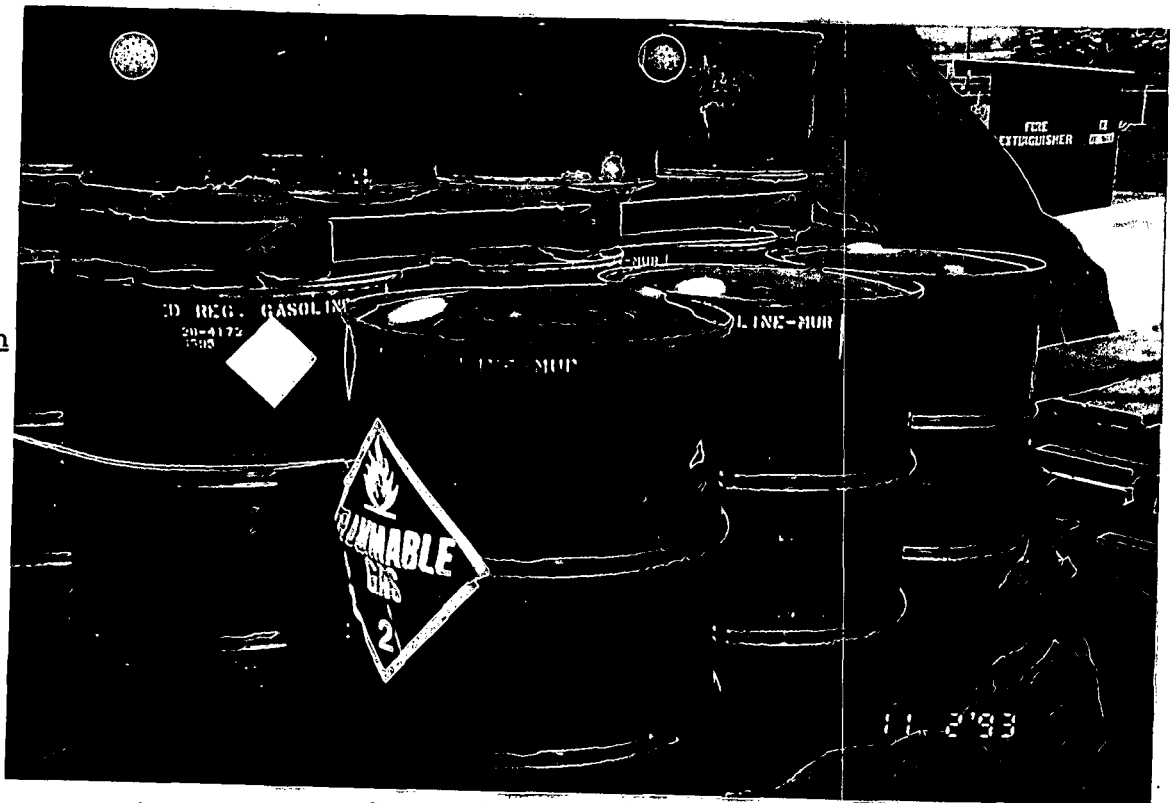


Photo No.: 12

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Drums stacked at northtwest corner of containment pad



Photo No.: 13

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Older drums, marked "Jet A-1" on containment pad



Photo No.: 14

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Bins marked "reusable containers" on northeast end of property



Photo No.: 16

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Wide view of northeast
corner of property.
Drums and crates with
various labeling.
Items appear to have
been accumulating
for some time

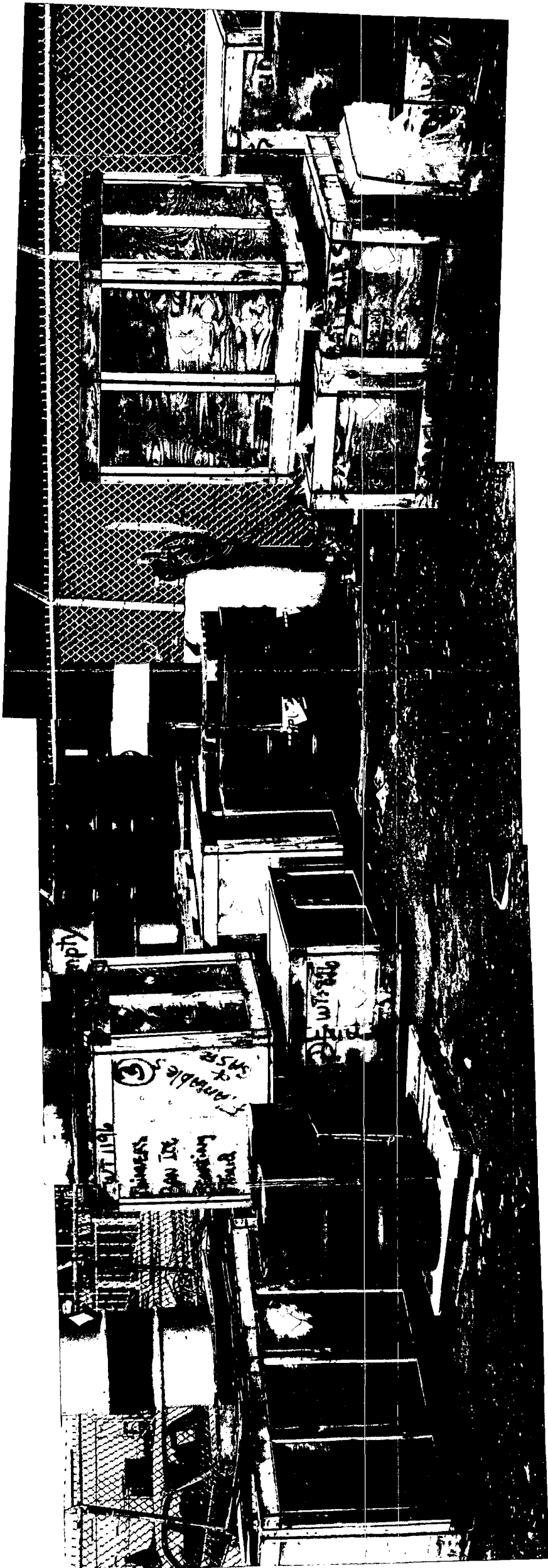


Photo No.: 17

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Wide shot against eastern
fence line (continuation
of above photo --
crates, wood waste, gas
cylinders)

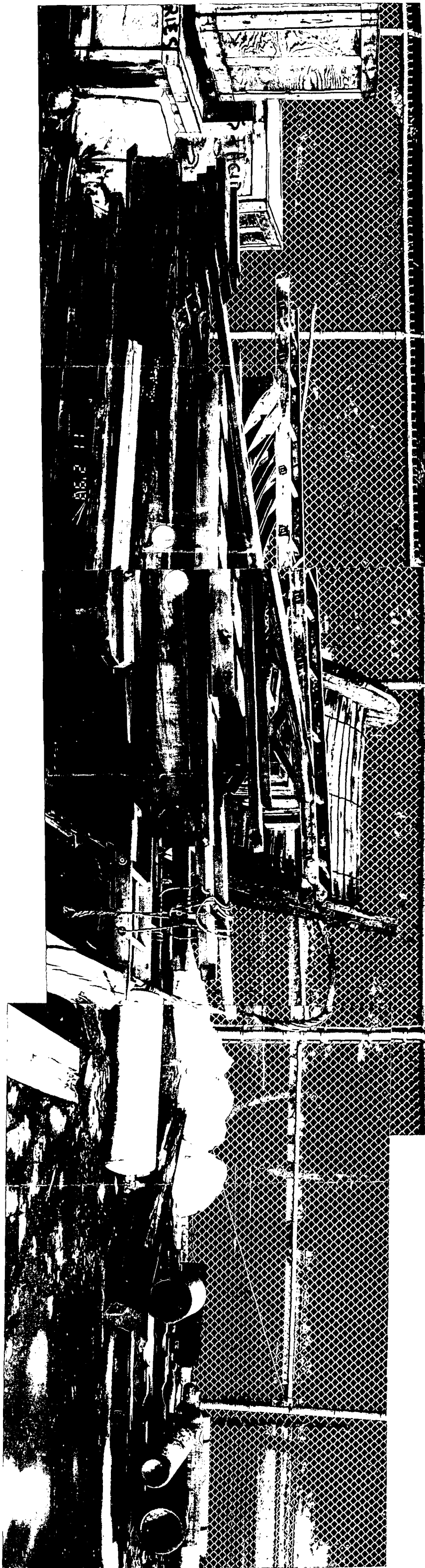


Photo No.: 15

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Unused refrigeration units on Northeast end of property

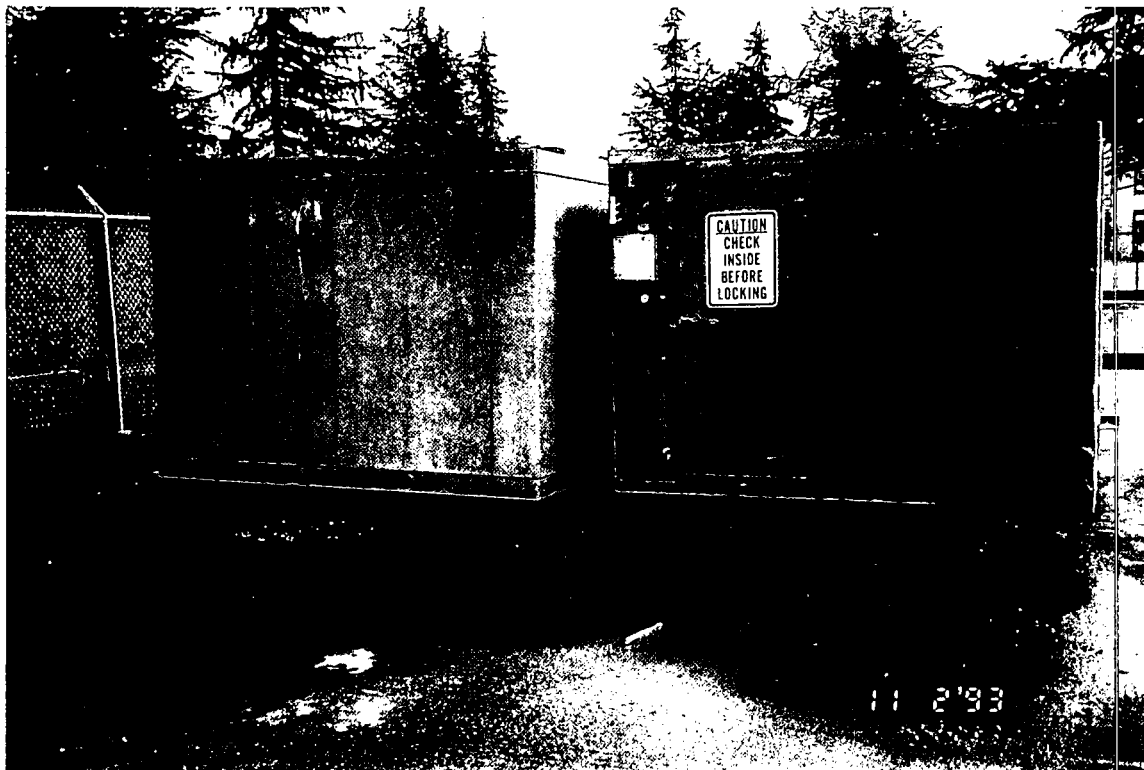


Photo No.: 18

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Close up of fifty-five gallon drums in northeast corner. Many of these drums were labeled as empty but acutally contain material (contents unknown)



Photo No.: 19

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Close up of crate on Norhteast corner

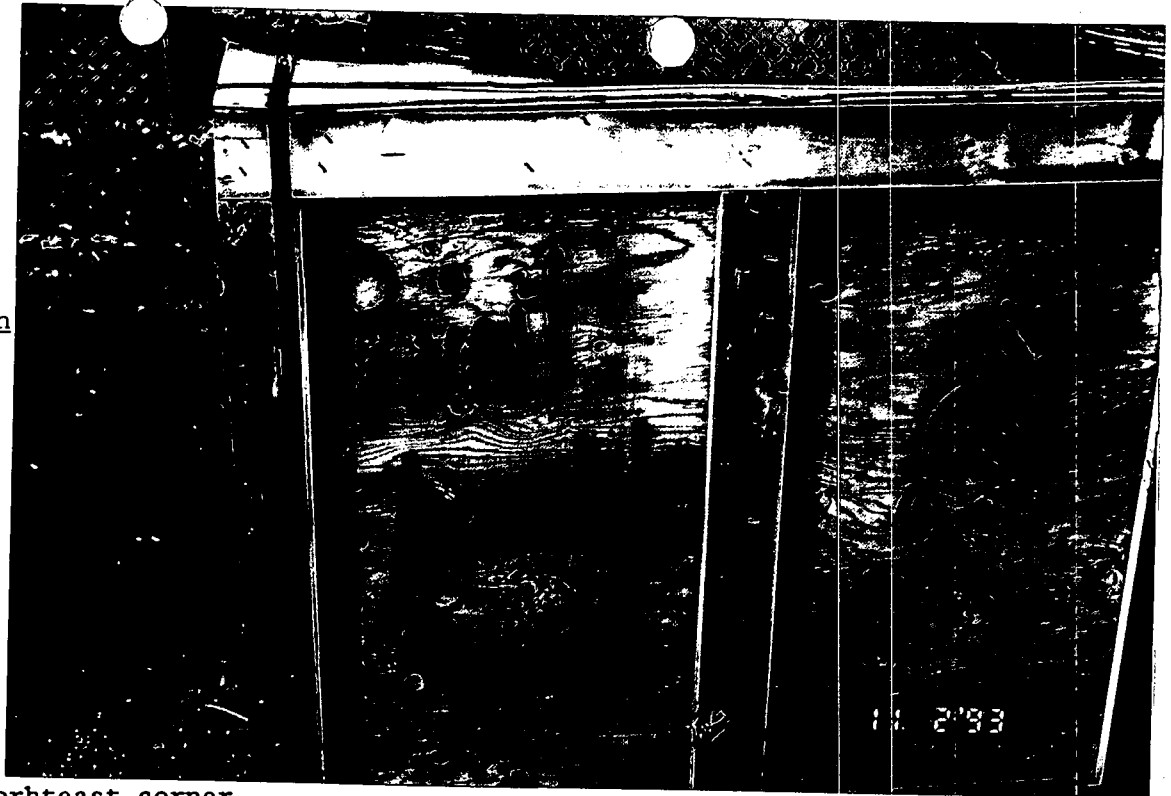


Photo No.: 20

Roll No.: 1

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Same as above



Photo No.: 21

Roll No.: 2

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Corrosive label on crate on northeast corner

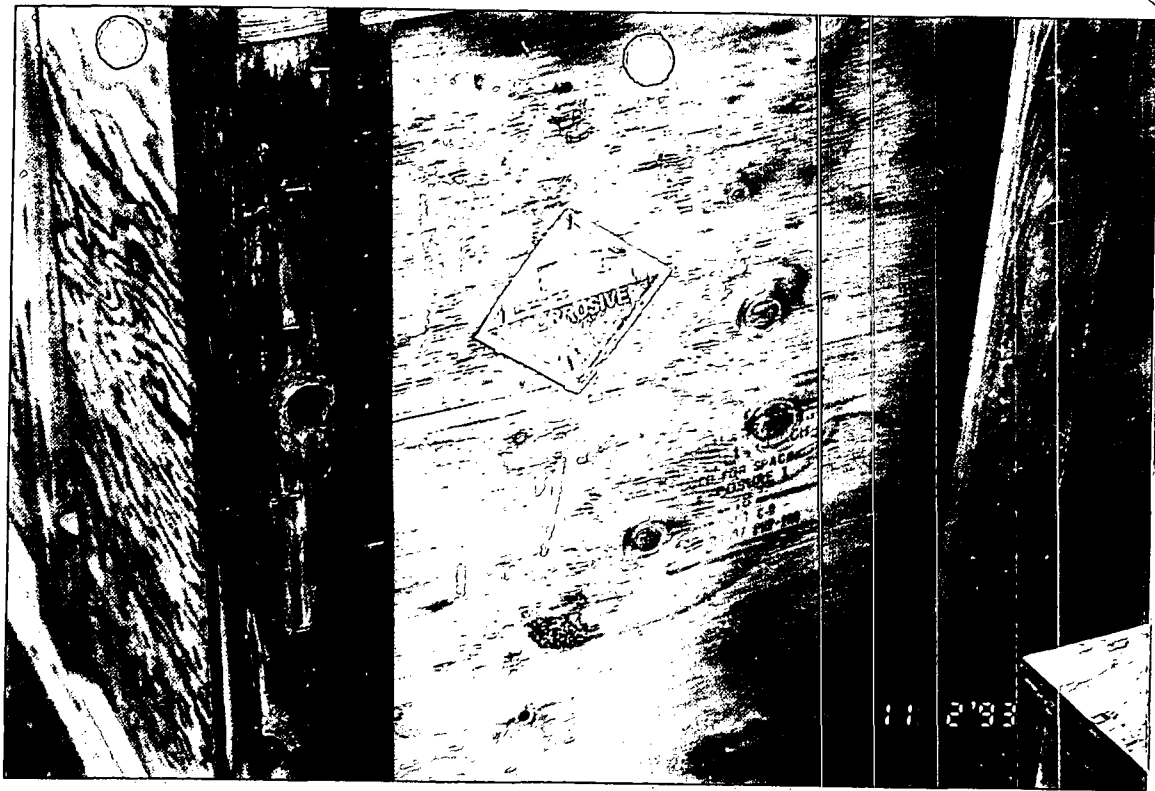


Photo No.: 22

Roll No.: 2

Date: 02/11/93

Facility:
USGSA Fed. Center South

EPA ID Number:
WA8470031891

Time: pm

Photographer:
Josh Chaitin

Witness:
Jeannie Summerhays

Description:
Gas cylinders stored on site

